

Application No.: 10/501,564
Amendment Dated: February 15, 2007
Reply to Office Action of: November 15, 2006

MAT-8574US

Remarks/Arguments:

Claims 1-35 are pending and stand rejected.

By this Amendment, new claim 36 is added. Support for the new claim can be found in the original specification, for example, at page 31, lines 11-22.

Rejection of Claims 1, 3 and 20 Under 35 U.S.C. § 103(a)

In the Office Action, at item 2, claims 1, 3 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Iyer et al. (U.S. Patent Publication No. 2004/0203749, hereinafter "Iyer") in view of Flykt (WO 01/41395, hereinafter "Flykt") in further view of Inoue (U.S. Patent No. 6,587,882).

This ground of rejection is respectfully traversed.

Claim 1

Claim 1 is directed to a method of managing mobility of a mobile terminal on at least one domain network including a plurality of subnets, each subnet having at least one home agent apparatus, and recites "responsive to the mobile terminal moving to another subnet of the plurality of subnets **for a threshold period**, changing the main home agent apparatus to another one of the home agent apparatus," (emphasis added).

Iyer and Flykt References

In the Office Action, at page 4, the Examiner acknowledges that the combination of Iyer and Flykt "do not expressly teach the step of changing the main home agent in response to the mobile terminals moving to another subnet."

Inoue Reference

In the Office Action, at page 4, the Examiner contends that Inoue "teaches the step of leasing the visiting network as the home network when the mobile station moves to a visiting network which broadly reads on the limitation of 'responsive to the mobile terminal moving to another subnet of the plurality of subnets for a threshold period, changing the main home agent apparatus to another one of the home agent apparatus' (Abstract, Fig. 16, and 18, C3 L33-40, C4 L9-24, C9 L28-39, C22 L24-C23 L32 especially step S39-S42)."

Applicants respectfully disagree with the Examiner regarding the Examiner's contention. Inoue discloses a mobile IP communication scheme in which a visited site or nearby network of a mobile computer is utilized as a temporal home network. (See the Abstract of Inoue.) Inoue describes the use of a leased temporal address (i.e., renting an address on the nearby network). The leased address is eventually released such that the registration of the mobile computer on the nearby network is deleted. The deletion of this registration is based on a lease period. For example, the temporal address may be reregistered for an extended lease period. (See Inoue at col. 11, lines 21-35 and col. 12, lines 5-26.) Inoue, however, is silent regarding changing of a main home agent apparatus to another one of the home agent apparatus, responsive to the mobile terminal moving to another subnet **for a threshold period**. This is because, Inoue does not discuss anything related to the mobile terminal changing home agent apparatus responsive to moving to another subnet for a threshold period. Instead, Inoue discloses changing of the home agent apparatus for a temporary period, i.e., the lease period, responsive to a mobile computer visiting a nearby network. That is, in Inoue, the change of home agent apparatus is for a temporary period responsive to the mobile computer visiting the nearby network (i.e., the change of home agent in Inoue is immediately after the mobile computer visits the nearby network) which is in contrast to the recitation in claim 1 of "changing the main home agent apparatus" "responsive to the mobile terminal **moving ... for a threshold period**."

Accordingly, it is submitted that claim 1 patentably distinguishes over the cited art of Iyer, Flykt and Inoue for at least the reasons set forth above.

Claim 20

Claim 20, which includes similar but not identical features to those of claim 1, is submitted to patentably distinguish over Iyer, Flykt and Inoue for at least similar reasons to those of claim 1.

Claim 3

Claim 3, which includes all of the limitations of claim 1, is submitted to also patentably distinguish over the claim 1 of Iyer, Flykt and Inoue for at least the same reason as claim 1.

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Rejection of Claims 2, 21-28 and 35 under 35 U.S.C. § 103(a)

In the Office Action, at item 6, claims 2, 4-19, 21-28 and 35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Iyer, Flykt and Inoue, further in view of Wenzel et al. (U.S. Patent Publication No. 2003/0073439, hereinafter "Wenzel").

The Examiner indicates in item 6 of the Office Action that claims 4-19 are rejected over Iyer, Flykt and Inoue further in view of Wenzel, however, the main body of this rejection does not address these claims. Further, claims 4-19 are addressed in the rejection which includes an additional reference to Heller (U.S. Patent Publication No. 2002/0147837) at item 16. Accordingly, Applicants will address claims 4-19 with respect to the rejection which includes Heller as set forth in the next portion of this Amendment.

Reconsideration is respectfully requested.

Claims 2, 21-28 and 35, which include all of the limitations of claim 1 or claim 20, are submitted to patentably distinguish over Iyer, Flykt and Inoue for at least the same reasons as claim 1 or claim 20.

Wenzel Reference

It is submitted that Wenzel does not overcome the deficiencies of Iyer, Flykt and Inoue. Wenzel discloses a subscriber unit with a plurality of IP addresses, each corresponding to a home agent of the service provider. These programmed IP addresses include the IP addresses of a primary home agent and a secondary home agent. Upon an initial registration attempt, the subscriber unit attempts to register with its primary home agent, if this operation fails, the subscriber unit attempts registration with its assigned secondary home agent. (See Wenzel at paragraph [0010].) That is, Wenzel is concerned with change of home agent responsive to a failed registration attempt. Wenzel is silent regarding a change of home agent responsive to "the mobile terminal moving to another subnet ... for a threshold period," as required by claim 1 and similarly recited in claim 20.

Accordingly, it is submitted that claims 2, 21-28 and 35, which include all of the limitations of claim 1 or claim 20, patentably distinguish over the cited art of Iyer, Flykt and Inoue further in view of Wenzel for at least the above-mentioned reasons.

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Rejection of Claims 4-19 and 29-34 under 35 U.S.C. § 103(a)

In the Office Action, at item 16, claims 4-19 and 29-34 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Iyer, Flykt and Inoue in view of Wenzel and further in view of Heller.

This ground of rejection is respectfully traversed.

Claims 14-19 and 29-34, which include all of the limitations of claim 1 or claim 20, are submitted to patentably distinguish over Iyer, Flykt, Inoue, and Wenzel for at least the same reasons as claim 1 or claim 20.

Heller Reference

It is submitted that Heller does not overcome the deficiencies of Iyer, Flykt, Inoue and Wenzel. This is because, Heller does not disclose or suggest the feature of "responsive to the mobile terminal moving to another subnet ... for a threshold period, changing the main home agent apparatus to another one of the home agent apparatus," as required by claim 1 and similarly recited in claim 20. That is, for example, Heller is silent regarding changing the home agent apparatus responsive to the mobile terminal moving **for a threshold period**.

Accordingly, it is submitted that claims 4-19 and 29-34, which include all the limitations of claim 1 or claim 20, are submitted to patentably distinguish over Iyer, Flykt, Inoue, Wenzel and Heller for at least the same reasons as claim 1 or claim 20.

New Claim 36

New claim 36, which includes all the limitations of claim 1, is submitted to patentably distinguish over the cited art for at least the same reasons as claim 1.

New claim 36 includes patentable distinctions beyond those of claim 1, namely, that "the mobile terminal measures a composite time corresponding to the mobile terminal being on the other network, and when the composite time reaches the threshold, the mobile terminal changes to the other one of the home agent apparatus, corresponding to the other subnet." These features are not disclosed or suggested by any of the cited art of Iyer, Flykt, Inoue, Wenzel or Heller.

Consideration and approval are respectfully requested.

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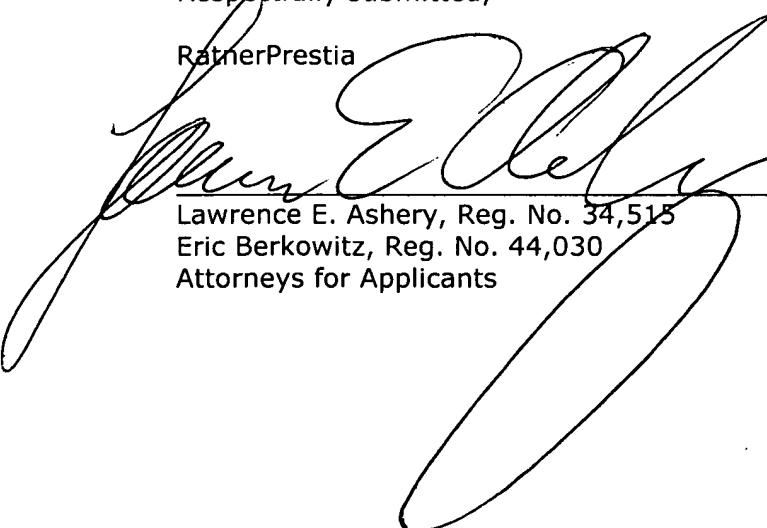
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Conclusion

In view of the new claim and remarks, it is submitted the application is in condition for allowance, which action is respectfully requested.

Respectfully submitted,

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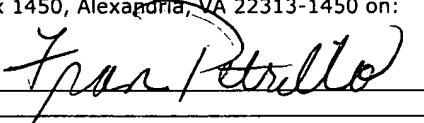
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